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March 12, 2024

VIA ECF

The Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
Daniel Patrick Moynihan
500 Pearl Street
New York, New York 10007

Re: *Carroll v. Trump*, No. 1:20-cv-7311-LAK-JLC – Revised Bond Documentation

Dear Judge Kaplan:

Pursuant to the Court's order of March 11, 2024, ECF No. 322, to submit revised bond documentation promptly, Defendant and the surety have executed the attached rider to the previously submitted bond, which implements the changes discussed in Plaintiff's letter of March 11, 2024, ECF No. 320. Plaintiff's counsel has reviewed this rider and has no objection. We respectfully request that you approve the previously filed bond, ECF No. 318, as modified by the attached rider.

New York, New York
March 12, 2024

Respectfully submitted,

/s/ Michael T. Madaio

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* *Pro Hac Vice* pending

** *Pro Hac Vice* forthcoming

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